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April 28, 2022

BY ECF

The Honorable Edgardo Ramos
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Trevor Milton*, 21-cr-478 (ER)

Dear Judge Ramos:

We write to request respectfully that Your Honor issue the subpoenas for our upcoming trial that were delivered to Chambers on March 29, 2022. As you know, Mr. Milton has exercised his constitutional right to a speedy trial and anticipates trial will commence on July 18, 2022. We do not want service of the subpoenas, or possible motion practice related thereto, to cause any delay. The government already has agreed that July 18, 2022 may be used for purposes of issuing the subpoenas. *See* March 22, 2022 Letter from Government at 1, n.1 (ECF No. 101).

In addition to seeking issuance of the subpoenas, we also write to request respectfully that Your Honor lock in the July 18, 2022 trial date, which you set previously as tentative. Confirming July 18 as the trial date will allow Mr. Milton to make crucial health care arrangements that are necessary for a member of his immediate family during trial in New York. For a host of reasons, including logistics and cost, those arrangements must be made sooner rather than later.

We are available for a conference at your convenience if the Court requires further information or can advise us as to when the trial will be calendared.

CAHILL GORDON & REINDEL LLP

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Respectfully submitted,

/s/

Bradley J. Bondi

cc: Counsel of Record (by ECF)